

Defendant, Mariana N. Farani, by and through counsel of record, David V. Finlayson, hereby moves this Court for extension of time to file additional motions. This motion is made on the following grounds. Following recent discussions with co-counsel and counsel for the Government, Ms. Farani expects to receive further discovery identifying possible witnesses and clarifying information related to the discovery already received. The defendants have received a large volume of information related to Supplemental Nutrition Assistance Program (“SNAP”) card transactions. The SNAP card transaction evidence will be a large part of the Government’s case and is the central basis for the defendants’ conspiracy and wire fraud charges. The defendants have requested further information in order to identify the card-holders and other

information related to those transactions. It is expected that both the defendants and the Government will be requesting an Order from this Court requiring the United States Department of Agriculture and related agencies to provide the requested information subject to protective conditions to be set by this Court.

Additionally, it is expected that the Government will soon be providing expert witness information to the defendants and that a hearing will be necessary in order to deal with the admissibility of the expert testimony. Finally, it is Ms. Farani's understanding that the Government will soon be filing a motion to join this case with another case, 1:12CR087, set before the Honorable Dee Benson. Ms. Farani expects that a motion to sever may thereafter be necessary.

A status conference is presently set in one week, October 7, 2013. Ms. Farani therefore respectfully requests that she be allowed to provide further information at that status conference related to the ongoing discovery and other issues and that this Court extend the motion cut-off date as may be appropriate at that time.

DATED this 30th day of September, 2013.

/s/ David V. Finlayson
DAVID V. FINLAYSON
Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of September, 2013, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which sent notification of such filing to the following, all defense counsel and:

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/s/ David V. Finlayson